

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION

HUBERT JONES, )  
PLAINTIFF, )  
V. ) CIVIL ACTION NO: 1:05CV-612-MHT  
DAVID JONES, et. al., )  
DEFENDANTS. )

**PLAINTIFF'S RESPONSE TO TRANS UNION LLC'S ANSWER**

Comes now the Plaintiff, Hubert Jones, by and through counsel of record, Donna C. Crooks, and files this his Response to the Defendant Trans Union LLC's Answer and Defenses to the Amended Complaint filed heretofore and would show say as follows:

1. Plaintiff adamantly denies that he failed to mitigate damages as alleged in the defenses filed by Defendant Trans Union LLC.
2. Plaintiff adamantly denies that he was contributorily negligent as alleged in the defenses filed by Defendant Trans Union LLC.

Respectfully submitted on this the 29th day of September, 2006.

s/Donna C. Crooks  
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## CERTIFICATE OF SERVICE

This is to certify that on the 29th day of September, 2006, a true and correct copy of the above and foregoing document has been electronically filed with the foregoing Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel and/or a copy is mailed via U.S. Mail, postage prepaid and properly addressed to those individuals who are non-CM/ECF participants:

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